

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-02796-CRC**

JAMES MADISON PROJECT et al v. DEPARTMENT OF
DEFENSE
Assigned to: Judge Christopher R. Cooper
Cause: 05:552 Freedom of Information Act

Date Filed: 11/30/2018
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

JAMES MADISON PROJECT

represented by **Mark Steven Zaid**
LAW OFFICES OF MARK S. ZAID, P.C.
1250 Connecticut Avenue, NW
Suite 700
Washington, DC 20036
(202) 454-2809
Fax: (202) 330-5610
Email: Mark@MarkZaid.com
ATTORNEY TO BE NOTICED

Bradley Prescott Moss
LAW OFFICES OF MARK S. ZAID, P.C.
1250 Connecticut Avenue, NW
Suite 700
Washington, DC 20036
(202) 454-2809
Fax: (202) 330-5610
Email: brad@markzaid.com
ATTORNEY TO BE NOTICED

Plaintiff

BRIAN J. KAREM

represented by **Mark Steven Zaid**
(See above for address)
ATTORNEY TO BE NOTICED

Bradley Prescott Moss
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

DEPARTMENT OF DEFENSE

represented by **Jeremy Allen Haugh**
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2574
Fax: (202) 252-2599
Email: jeremy.haugh@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Roberto Cesar Martens , Jr.
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2574

Date Filed	#	Docket Text
11/30/2018	<u>1</u>	COMPLAINT against DEPARTMENT OF DEFENSE (Filing fee \$ 400 receipt number 0090-5816410) filed by JAMES MADISON PROJECT, BRIAN J. KAREM. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit Rule 7.1 certification, # <u>3</u> Summons DoD, # <u>4</u> Summons USADC, # <u>5</u> Summons USAG)(Moss, Bradley) (Entered: 11/30/2018)
11/30/2018		Case Assigned to Judge Christopher R. Cooper. (zef,) (Entered: 12/04/2018)
12/04/2018	<u>2</u>	SUMMONS (3) Issued Electronically as to All Defendants, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zef,) (Entered: 12/04/2018)
12/04/2018	<u>3</u>	LCvR 7.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by JAMES MADISON PROJECT. (zmd) (Entered: 12/04/2018)
12/26/2018	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 12/17/2018. Answer due for ALL FEDERAL DEFENDANTS by 1/16/2019. (Attachments: # <u>1</u> Exhibit USADC receipt)(Moss, Bradley) (Entered: 12/26/2018)
12/26/2018	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF DEFENSE served on 12/17/2018 (Attachments: # <u>1</u> Exhibit DoD receipt)(Moss, Bradley) (Entered: 12/26/2018)
01/11/2019	<u>6</u>	NOTICE of Appearance by Roberto Cesar Martens, Jr on behalf of DEPARTMENT OF DEFENSE (Martens, Roberto) (Entered: 01/11/2019)
01/11/2019	<u>7</u>	ANSWER to Complaint by DEPARTMENT OF DEFENSE.(Martens, Roberto) (Entered: 01/11/2019)
01/11/2019		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. It is hereby ORDERED that the parties shall promptly confer and file a joint proposed schedule for briefing or disclosure by Monday, January 28, 2019. Signed by Judge Christopher R. Cooper on 1/11/2019. (lccrc2) (Entered: 01/11/2019)
01/11/2019		Set/Reset Deadlines: Joint Proposed Briefing Schedule due by 1/28/2019 (lsj) (Entered: 01/11/2019)
01/28/2019	<u>8</u>	PROPOSED BRIEFING SCHEDULE re Order, (<i>Joint Proposed FOIA Disclosure Schedule</i>) by DEPARTMENT OF DEFENSE. (Attachments: # <u>1</u> Text of Proposed Order)(Martens, Roberto) (Entered: 01/28/2019)
02/01/2019		MINUTE ORDER: In light of <u>8</u> Joint Proposed Disclosure Schedule, Defendant shall begin monthly rolling production of the requested records on February 28, 2019, with production to be completed on or before July 31, 2019. In addition, the parties shall provide the Court with a joint status report on May 31, 2019, and again on July 31, 2019, apprising the Court on the status of production and any other issues that may arise. Signed by Judge Christopher R. Cooper on 2/1/2019. (lccrc2) (Entered: 02/01/2019)
02/05/2019		Set/Reset Deadlines: Joint Status Report due by 5/31/2019. Further Joint Status Report due by 7/31/2019. (lsj) (Entered: 02/05/2019)
05/30/2019	<u>9</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 05/30/2019)
05/31/2019	<u>10</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Martens, Roberto) (Entered: 05/31/2019)
07/27/2019	<u>11</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Jeremy Allen Haugh on behalf of DEPARTMENT OF DEFENSE Substituting for attorney Roberto Martens (Haugh, Jeremy) (Entered: 07/27/2019)

07/31/2019	<u>12</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Haugh, Jeremy) (Entered: 07/31/2019)
07/31/2019		MINUTE ORDER: In light of <u>12</u> the parties' joint status report, Defendant shall complete production of the remaining records on or before September 30, 2019. Defendant shall also provide the Court an update on the status of production on or before August 30, 2019. Signed by Judge Christopher R. Cooper on 7/31/2019. (lccrc2) (Entered: 07/31/2019)
08/30/2019	<u>13</u>	STATUS REPORT by DEPARTMENT OF DEFENSE. (Haugh, Jeremy) (Entered: 08/30/2019)
09/03/2019		MINUTE ORDER: Upon consideration of <u>13</u> Status Report by the Department of Defense, it is hereby ORDERED that the parties shall meet and confer after the completion of production of the remaining records on or before September 30, 2019. The parties shall file a joint status report by October 30, 2019, and, if any disputes remain, shall include a proposed summary judgment briefing schedule in that report. Signed by Judge Christopher R. Cooper on 9/3/19. (lccrc2) (Entered: 09/03/2019)
09/04/2019		Set/Reset Deadlines: Joint Status Report due by 10/30/2019 (lsj) (Entered: 09/04/2019)
10/30/2019	<u>14</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Haugh, Jeremy) (Entered: 10/30/2019)
10/31/2019		MINUTE ORDER: The parties are directed to file a joint status report by November 14, 2019, which shall include an update as to whether any issues remain and, if necessary, a joint proposed briefing schedule. Signed by Judge Christopher R. Cooper on 10/31/19. (lccrc2) (Entered: 10/31/2019)
11/07/2019	<u>15</u>	Joint STATUS REPORT by JAMES MADISON PROJECT, BRIAN J. KAREM. (Attachments: # <u>1</u> Text of Proposed Order)(Moss, Bradley) (Entered: 11/07/2019)
11/08/2019		MINUTE ORDER: In light of <u>15</u> the parties' latest joint status report, the parties are directed to file a joint status report by December 6, 2019, which shall include an outline of any issues that remain and, if necessary, a joint proposed briefing schedule. Signed by Judge Christopher R. Cooper on 11/8/19. (lccrc2) (Entered: 11/08/2019)
11/08/2019		Set/Reset Deadlines: Joint Status Report due by 12/6/2019. (znbn) (Entered: 11/08/2019)